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UNITED STATES DISTRICT COURT ALBUQUERQUE, NEW MEXICO

JUN 24 2020

# IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF NEW MEXICO

MITCHELL R. ELFERS CLERK

UNITED STATES OF AMERICA,	
Plaintiff,	) CRIMINAL NO. 20-1429 MV
vs.	) Counts 1 - 3: 16 U.S.C. §§ 703 and
RUTH GRANDE OLGUIN,	<ul><li>707(b)(2): Sale and Offer for Sale of</li><li>Any Migratory Bird.</li></ul>
Defendant.	)

## INDICTMENT

The Grand Jury charges:

### Count 1

On or about April 27, 2019, in Bernalillo County, in the District of New Mexico, the defendant, **RUTH GRANDE OLGUIN**, knowingly and without permission, did sell and offer to sell feathers protected by the Migratory Bird Treaty Act, to wit, the feathers of a Crested Caracara (Caracara cheriway).

In violation of 16 U.S.C. §§ 703 and 707(b)(2).

#### Count 2

On or about May 22, 2019, in Bernalillo County, in the District of New Mexico, the defendant, **RUTH GRANDE OLGUIN**, knowingly and without permission, did sell and offer to sell feathers protected by the Migratory Bird Treaty Act, to wit, the feathers of a Crested Caracara (*Caracara cheriway*) and feathers of a Sharp-shinned Hawk (*Accipiter striatus*). In violation of 16 U.S.C. §§ 703 and 707(b)(2).

### Count 3

On or about November 12, 2019, in Bernalillo County, in the District of New Mexico, the defendant, RUTH GRANDE OLGUIN, knowingly and without permission, did sell and offer to sell feathers protected by the Migratory Bird Treaty Act, to wit, the feathers of a Crested Caracara (Caracara cheriway).

In violation of 16 U.S.C. §§ 703 and 707(b)(2).

## **FORFEITURE ALLEGATIONS**

Upon conviction of any of the offenses alleged in this Indictment, the defendant, RUTH GRANDE OLGUIN, shall forfeit to the United States, pursuant to 16 USC §§ 703 and 706, any interest she may have in the feathers of the Crested Caracara (Caracara cheriway) and the feathers of the Sharp-shinned Hawk (Accipiter striatus).

A TRUE BILL:

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FOREPERSON OF THE GRAND JURY

Assistant United States Attorney

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